

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



September 7, 2006

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at a Dinner Sponsored by Lockheed Martin, Pratt & Whitney, and Greater New Orleans Inc. in New Orleans, September 10, 2006

On September 10, 2006, Lockheed Martin, Pratt & Whitney, and Greater New Orleans Inc. (the Regional Chamber of Commerce) will host a dinner at Arnaud's Restaurant in the French Quarter of New Orleans, Louisiana. The dinner will be held in conjunction with a visit by members of the House Science Committee to the Michoud Assembly Facility in New Orleans. The dinner will be widely attended by members of Congress, congressional staff, industry, the New Orleans City Council, Greater New Orleans Inc., a civic association called the "Ladies of the Storm," and NASA employees. Approximately 50 people are expected to attend. The estimated cost of the dinner, which includes all food and beverages and will be paid for by Lockheed Martin and Pratt & Whitney, is \$75 per person. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g).

I have determined that free attendance of NASA employees is in the best interests of the Agency because it will further NASA programs and operations. The dinner will allow NASA employees the opportunity to discuss with the other guests the accomplishments and progress of the Space program, including the role of the Michoud Assembly Facility, and other aspects of common interest. Accordingly, NASA employees whose duties do not substantially affect the event sponsors or, in the case of Greater New Orleans Inc., a majority of all of its members, may accept an invitation for free attendance to the event for themselves and their invited spouses or guests.

However, NASA employees whose duties may substantially affect the event sponsors or a majority of all of Greater New Orleans Inc.'s members, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

In addition, the industry sponsors may give each attendee a memento. Each company's mementos will be valued at less than \$20 each. Attendees are reminded of the \$20 gift exception at 5 CFR §2635.204(a) which provides that employees may accept gifts valued at

no more than \$20 per occasion. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept these mementos. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.

Kathleen T. Spear

for R. Andrew Falcon